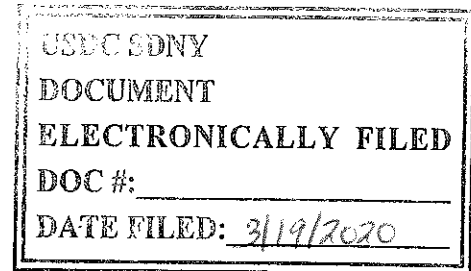




March 18, 2020

By ECF

Hon. Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: United States v. Christopher Santos Felix;  
Docket Number: 19-cr-228

Your Honor,

I represent the Defendant in the above-referenced matter along with Javier A. Solano, Esq. This case is scheduled for a sentencing on April 13, 2020. However, I write with consent of AUSA Kedar Bhatia to respectfully request that this date be adjourned by forty-five days until May 28, 2020. The reason for this request is because the defendant's mitigation specialist has been unable to meet with the client to finalize the pre-sentencing submission to the Court and defense counsel has been unable to review the PSR with the defendant. The reason for these delays is because the MCC (where the defendant is in custody) has been unable to allow visits for counsel because of a security concern affecting the entire jail as well as the newly imposed COVID-19 restrictions. I would therefore respectfully request that the sentencing date be adjourned and that all related submission deadlines be accordingly extended. This is the defendant's third request for an adjournment of the sentencing date. I thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Kushner'.

Michael P. Kushner, Esq.

Cc: AUSA Kedar Bhatia  
(Via ECF)

Sentence is adjourned to may  
28, 2020 at 10:00am.  
Defense submission is due  
may 14, 2020. Government  
submission is due may 21, 2020.

16 Court Street, 36<sup>th</sup> Floor • Brooklyn, New York 11241  
718.504.1440 (telephone) • 718.504.4850 (facsimile)  
www.KushLaw.com Date: 3/19/2020

Richard M. Berman  
Richard M. Berman, U.S.D.J.